

Alexander Otis Matthews
24394-016
PO BOX 9000
Berlin Federal Prison Camp
Berlin, NH 03570

202017

Date: 3/13/2017

re: 1:14-cv-207-LO-MSN Alexander Otis Matthews v.
Estrategia Investimentos, S.A., et al
Request For Service Via Email

Ms. Paulina Miller
Deputy Clerk
E.D.VA/Alexandria US District Court
401 Courthouse Square
Alexandria, VA 22314

Dear Deputy Clerk Miller:

This letter is in reply to your March 7, 2017 letter to me concerning my request for service of Centrum Bank via their corporate email.

I respectfully challenge your finding that this EDVA district does not permit service via email for international defendants. Not only is this permitted in this district, Judge Thomas Rawles Jones, Jr. of this very court has ruled that it satisfies the rigors of constitutional due process. Please reference his decision in Whoshere, Inc., Plaintiff v. Gokhan Oran d/b/a WhoNear; Who Near; whonear me, Defendant, U.S. Dist LEXIS 22084, Civil No. 1:13-cv-00526-AJT-TRJ (4th Cir. 2014). In that EDVA case Judge Jones ruled that " In applying Rule 4(f)(3), a court must tailor the method of service to the circumstances so long as that method 1) is not prohibited by international agreement and 2) comports with constitutional notions of due process." The Court then cited Gurung v. Malhotra, 279 F.R.D 215, 219 (S.D.N.Y. 2011); In re Int'l Telemedia Associates, Inc., 245 B.R. 713, 720 (Bankr. N.D. GA 2000); and Chanel, Inc v. acheterchanel.com, 2012 US Dist LEXIS 115518, 2012 WL 3544844, at *3 (S.D. Fla. Aug. 16, 2012).

Judge Jones concluded that " The court finds that service of process on defendant by email and social media networking websites identified by defendant as belonging to him complies with both Rule 4(f)(3) and constitutional due process."

Accordingly, as an indigent plaintiff who is presently confined I respectfully ask that either this Clerk's Office or the US Marshall's Office scan the complaint into a PDF or Word Doc file and deliver the complaint to the defendant's following corporate email address:

info@centrumbank.ch

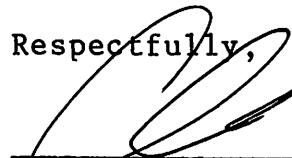
My family has checked thoroughly and Centrum Bank has no present US Address. Their current physical address is:

Centrum Bank AG
Bellerivestrasse 42
Postfach 8034
Zurich, Switzerland

In this particular situation with no US address for this defendant there is no other option for me to effect service upon Centrum Bank. Since service by this method is recognized by this Court I respectfully ask that your office effect service upon Centrum Bank via its email I just provided.

Thank you very much for your assistance.

Respectfully,


Alexander Otis Matthews

24394-016 ~
Alexander Otis Matthews
Berlin Federal Prison Camp
PO Box 9000
Berlin, NH 03356
United States

WHITE FLIMER INJECTION VERSION 1.1

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401 Courthouse Sq
Alexandria, VA 22314
United States

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